REMARKS

This Amendment is being filed in response to the Office Action mailed August 23, 2006, which has been reviewed and carefully considered. Reconsideration and allowance of the present application in view of the amendments made above and the remarks to follow are respectfully requested.

By means of the present amendment, independent claim 25 has been amended for better conformance to U.S. practice, namely beginning the independent claim 25 with 'The'. Claim 25 was not amended in order to address issues of patentability and Applicant respectfully reserves all rights under the Doctrine of Equivalents.

In the Final Office Action, the Examiner objected to the drawings because the handwritten characters of the replacement sheets are not legible. It is believed that this rejection is an oversight as it had already been addressed in the Amendment filed on July 3, 2006, in response to the Final Office Action mailed May 5, 2006, where 4 sheets of Replacement Drawings had been submitted. The undersigned checked Public Pair and it appears that these 4 sheets of Replacement Drawings are of record and include clear

handwritten characters.   If this objection to the drawings is

maintained, then Applicant respectfully requests with exact

specificity which handwritten characters of which elements/boxes of

which figures are not legible.

The drawings are further objected to for failing to show N

codewords having a zero running digital sum (RDS), as described in

the specification.   Applicant respectfully points out that this

feature is shown in the drawings where, e.g., for the N=2, FIG 4

shows a graph that crosses the x-axis, i.e., has a value of zero

for every N=2 code words, as described on page 9, lines 27-30, for

example.   Further, in FIG 3, the last two boxes to the right of box

34b (of the pre-coded word 31) include 4 bits as follows: 0111 and

0001, where there digital sum is zero.   In fact, the Examiner has

admitted on the last line of page 3 of the Office Action that FIG 4

does indeed show the noted feature.   Accordingly, Applicant

respectfully requests withdrawal of the drawings objection and

approval of the proposed drawing sheets which were enclosed with

the Amendment filed on July 3, 2006, in response to the Final

Office Action mailed May 5, 2006.

In the Office Action, claims 1-25 are rejected under 35 U.S.C.

§112, first paragraph, since allegedly the following feature of

claim 1 "...a running digital sum of each group of N adjacent

codewords whose running [sum] equals zero" is not adequately

described in the specification, and how the coded data is combined

to form a running digital sum (RDS) zero. In particular, on the

last two lines, page 3, to page 4, line 2 of the Office Action, it

is alleged that:

> As for figure 4, adjacent codewords 42 and 42a
> may generate a zero disparity based on the graph,
> however, adjacent codewords 42a and 43 will not
> yield a zero disparity. Hence, the limitation
> that N adjacent codewords yield zero disparity is
> misleading.

Applicant agrees that adjacent code words 42a, 43 in FIG 4 may

not yield a zero RDS. However, it is respectfully submitted that

this in no way contradicts any features of claims 1-25.

Independent claims 1, 10, 19 and 24-25 do not require that a

combined running digital sum of adjacent code words equals zero.

Rather, independent claims 1, 10 and 19 specifically require:

> a combined running digital **sum of each group** of N
> **adjacent code words** equals zero.   (Illustrative
> emphasis provided)

It is respectfully submitted that this feature is clearly

described in the specification and shown in the figures. Further,

independent claims 1, 10 and 19 have been amended for better

clarity. Independent claim 1, now recites (with a similar

recitations in independent claims 10 and 19):

> coding the stream of precoded input words into a
> stream of groups of N code words such that a
> combined running digital sum of each group of N
> adjacent code words equals zero.

It is respectfully submitted that independent claims 1, 10 and

19 were merely amended herein to expedite consideration and

allowance of the subject matter contained therein and not in order

to address issues of patentability. Accordingly, Applicant

respectfully reserves all rights under the Doctrine of Equivalents.

It is further respectfully submitted that the specification

and drawings provide ample support and sufficient description, as

well as fully enable claims 1-25, in such a way as to reasonably

convey to one skilled in the relevant art how to make and/or use

the present invention without any undue experimentation.

In particular, page 9, lines 22-30 and FIG 4 show the

illustrative example where N=2, i.e., where 2 adjacent code words

form a group, where three groups 42-42a; 43-43a; and 44-44a are

shown in FIG 4. As clearly shown in FIG 4, the combined running

digital sum of each group 42-42a, 43-43a, and 44-44a, (where each

NL020577-amd-11-20-06.doc   14

group is formed by N=2 adjacent code words e.g., adjacent code words 42-42a; 43-43a; or 44-44a) equals zero.

Clearly, the specification including the figures comply with the written description and enablement requirement, and reasonably convey that the inventor, at the time of the application was filed had possession of the claimed invention, as well as reasonably convey to one skilled in the relevant art how to make and/or use the present invention without any undue experimentation. One skilled in the art would have no trouble making and/or using the present invention without any undue experimentation in view of the present specification and drawings. Accordingly, withdrawal of this rejection under 35 U.S.C. §112, first paragraph is respectfully requested, and allowance of claims 1-25 is respectfully requested.

In the Office Action, claims 1-25 are rejected under 35 U.S.C. §112, second paragraph as allegedly indefinite due to certain features in claims 1, 7-8, 16-17 and 22-25. It is respectfully submitted that claim 1 is not indefinite since the allegation on page 4, line 9, that "[f]or the coded data does not have an RDS (running digital sum) of "0"", is not required by claim 1. Rather,

claim 1 requires "a combined running digital sum of each group of N

adjacent code words equals zero," which is definite and fully

supported in the specification and figures as detailed above.

Regarding claims 7-8, 16-17 and 22, it is alleged on page 4,

lines 10-11, that "the tables of Figures 5 and 6 and claims

7,8,16,17,22 are misleading because their RDS are not equal to

zero." Applicant agrees that "their RDS are not equal to zero" and

respectfully submit that claims 7-8, 16-17 and 22 do not recite any

such features. Rather, claim 7 specifically recites that (with

similar recitations in claims 8, 16-17 and 22) "the stream of input

words is precoded using the following table." (Illustrative

emphasis added) It is respectfully submitted that there are no

recitations in the claims requiring the RDS of the precoded input

words be zero; rather, the precoded words are coded "into a stream

of groups of N code words such that a combined running digital sum

of each group of N adjacent code words equals zero," as

specifically recited in independent claim 1, and similarly recited

in independent claims 10 and 19.

Further, the rejection of claims 23-25 under 35 U.S.C. §112,

second paragraph is respectfully traversed. However, in the

NL020577-amd-11-20-06.doc   16

interest of advancing prosecution, claims 23-25 have been amended for better clarity.

It is respectfully submitted that claims 23-25 have been merely amended merely to expedite consideration and allowance of the subject matter contained therein and not in order to address issues of patentability. Accordingly, Applicant respectfully reserves all rights under the Doctrine of Equivalents. It is respectfully submitted that the rejection of claims 23-25 have been overcome and an indication as such is respectfully requested.

Based on the foregoing, withdrawal of the rejection under 35 U.S.C. §112, second paragraph, of claims 1-25 is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.
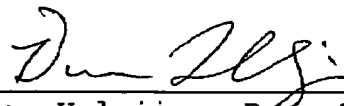
PATENT
Serial No. 10/517,976
Amendment in Reply to Office Action of August 23, 2006

It is believed that no additional fees or charges are
currently due beyond the fee for the Request for Continued
Examination (RCE) to be charged to the credit card as noted by the
enclosed authorization. However, in the event that any additional
fees or charges are required for entrance of the accompanying
amendment, they may be charged to applicants' representatives
Deposit Account No. 50-3649. In addition, please credit any
overpayments related to any fees paid in connection with the
accompanying amendment to Deposit Account No. 50-3649.

In view of the above, it is respectfully submitted that the
present application is in condition for allowance, and a Notice of
Allowance is earnestly solicited.

Respectfully submitted,

By _____
Dicran Halajian, Reg. 39,703
Attorney for Applicant(s)
November 20, 2006

THORNE & HALAJIAN, LLP
Applied Technology Center
111 West Main Street
Bay Shore, NY 11706
Tel: (631) 665-5139
Fax: (631) 665-5101

NL020577-amd-11-20-06.doc   18